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To: HarborComments
Subject: Harbor Comments

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Submitted values are:

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Your Comments:

The EPA's proposed plan is NOT adequate, is NOT a short- or long-term remedy, does NOT protect human health and environment, does NOT significantly lower the toxic burden on impacted communities, and from everything I have seen, it is not being accepted by the community.

EPA should embrace a plan that is AT LEAST as protective as Option G, with the modifications put forward by Yakama Nation. EPA must not approve a final remedy that is not chosen in consultation with those most impacted by harbor pollution. To do otherwise violates the spirit of its environmental justice mandate.

The City of Portland has done an abysmal job consulting with the people most affected by Portland Harbor pollution, and certainly does not speak for them in its official comments.

EPA must up-hold our fundamental right to a healthy environment. EPA must not embrace any clean-up decision that does not put us on track to removing all fish advisories from the Willamette River. EPA must use its enforcement authority to force early-action clean-up sites that put the Portland Harbor at risk of re-contamination once in-water clean-up begins. For the same reason EPA must compel DEQ to mandate clean-up of up-land sites. EPA must also recognize the import of the new Fish Consumption Rates that have been passed in Oregon and Washington's water quality rules -- which are the nation's highest. This is a reflection of the needs of our fishing peoples, and a recognition that a century of industrial pollution has created serious harm in their communities which we must commit to removing. EPA's Portland Harbor clean-up MUST move with all deliberate speed toward the protection of marine life and fish-dependent communities who are at risk from the accumulation of toxic substances in species like the pacific lamprey -- both from immediate absorption, and from risks to the marine food chain if lamprey continue on their current path to extinction.

Finally, EPA must recognize that the customary uses of the Willamette River are protected under the Public Trust doctrine which governs EPA's actions, and which form the bed-rock of all statutory environmental law. In fulfilling these Public Trust duties, EPA is not permitted to behave arbitrarily. It must listen to feedback from the community, and even more importantly, from the Treaty Tribes and urban Native Americans who have a fishing tradition in this region stretching back over 10,000 years.

EPA must recognize that environmental restoration is not a discretionary function -- it is a fundamental issue of justice at the heart of EPA's mission.

Environmental restoration is necessary for the restoration of the traditional cultures of the Pacific Northwest, who currently suffer from severe health problems as a result of the disruption of their traditional food sources -- including salmon, lamprey, and wapato in the Portland Harbor.

EPA must partner with tribal governments, urban native organizations, and other representatives of the most impacted communities in crafting an effective ROD that effectively restores the Portland Harbor, protects human health and the environment, and wins community acceptance. EPA's current plan does not do that, and must be abandoned.